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ACCOUNTABLE HEALTHCARE STAFFING,
INC., and ACCOUNTABLE HEALTHCARE
HOLDINGS CORP.

Additional Counsel for Defendants Listed On Next Page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

SARAH REYNOSA-JUAREZ, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

ACCOUNTABLE HEALTHCARE
STAFFING, INC., and ACCOUNTABLE
HEALTHCARE HOLDINGS, CORP,

Defendants.

Case No.: 5:18-cv-06302-EJD

**STIPULATION OF DISMISSAL IN
LIGHT OF SETTLEMENT**

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Attorneys for Defendants
ACCOUNTABLE HEALTHCARE STAFFING,
INC., and ACCOUNTABLE HEALTHCARE
HOLDINGS CORP.

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Sarah Reynosa-Juarez, and Defendants Accountable Healthcare Staffing, Inc. and Accountable Healthcare Holdings Corp (“Defendants”) (collectively the “Parties”) HEREBY STIPULATE as follows:

WHEREAS on October 15, 2018, Plaintiff filed this case as a collective action under the federal Fair Labor Standards Act (FLSA) and a putative class action under Rule 23 for violations of California law. (Dkt. 1).

WHEREAS on May 16, 2019, Defendants filed their renewed to Compel Individual Arbitration (Dkt. 38).

WHEREAS on November 7, 2019, the Court granted Defendants’ Motion and compelled arbitration of Plaintiff’s claims on an individual basis and stayed this case in its entirety pending the final resolution of arbitration. (Dkt. 50).

WHEREAS, on July 16, 2020, Plaintiff filed her demand for arbitration before the American Health Lawyers Association.

WHEREAS, on September 23, 2020, the parties reached an agreement to settle all of Plaintiff’s individual claims.

WHEREAS, as an individual settlement, the terms of the agreement are confidential, however, the settlement provides for the dismissal of this case, with prejudice with respect to all claims.

WHEREAS in light of the foregoing, the parties HEREBY STIPULATE and respectfully request, that the Court grant the parties’ request to voluntarily dismiss with this case with prejudice pursuant to the terms of the parties’ confidential settlement agreement.

Respectfully submitted,

Dated: January 20, 2021

JACKSON LEWIS P.C.

By: /s/ Shannon B. Nakabayashi
 Shannon B. Nakabayashi
 Mariko Mae Ashley
 Attorneys for Defendants
 ACCOUNTABLE HEALTHCARE
 STAFFING, INC., and
 ACCOUNTABLE HEALTHCARE
 HOLDINGS, CORP.

1 Dated: January 20, 2021

SCHNEIDER WALLACE COTTRELL
KONECKY LLP

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3 By: /s/ Leslie Joyner
Joshua Konecky
4 Leslie Joyner**
Attorneys for Plaintiffs

5 **I hereby attest that I have on file all holographic signatures corresponding to any
6 signatures indicated by a conformed signature (/s/) within this e-filed document.

7
8 **ATTESTATION PER LOCAL RULE 5-1(i)(3)**

9 The e-filing attorney hereby attests that concurrence in the filing of the document has been
10 obtained from each of the other signatories indicated by a conformed signature (/s/) within this e-
11 filed document.

12 Dated: January 20, 2021

/s/ Leslie Joyner
13 Leslie Joyner (SBN 262705)
14 SCHNEIDER WALLACE COTTRELL
KONECKY LLP

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17 **CERTIFICATE OF SERVICE**

18 I hereby certify that on January 20, 2021, I electronically filed the foregoing document with The
19 Clerk of the Court using the Court's CM/ECF system, which will send a notice of electronic filing
20 to all CM/ECF participants.

21 Dated: January 20, 2021

/s/ Leslie Joyner
22 Leslie Joyner (SBN 262705)
23 SCHNEIDER WALLACE COTTRELL
24 KONECKY LLP